

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

4700

* ACTION: _____

SOURCE: H

CONG DIST: 04

ZIP: 30207

CNTY CODE: 247

★ / / , / / .

HYDRO UNIT: 03070103

■

NPL DELISTING DATE:

APPROACH: SITE CLASS:

SITE/SPILL IDS:

RPM NAME:

RPM PHONE:

DIOXIN TIER:

REG FLD1:

REG FLD2: 6

RESP TERM: PENDING () NO FURTHER ACTION ()

* PENDING () NO FURTHER ACTION ()

ENF DISP: NO VIABLE RESP PARTY () VOLUNTARY RESPONSE ()

ENFORCED RESPONSE () COST RECOVERY ()

SITE DESCRIPTION:

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 478
RUN DATE: 85/10/18
RUN TIME: 08:29:07

M.2 - PROGRAM MAINTENANCE FORM

SITE: LITHONIA LIGHTING CO

EPA ID: GAD056201585 PROGRAM CODE: H01 PROGRAM TYPE:

PROGRAM QUALIFIER: ALIAS LINK :

PROGRAM NAME: SITE EVALUATION

DESCRIPTION:

* ACTION: _

* _

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REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 479
RUN DATE: 85/10/18
RUN TIME: 08:89:07

M.2 - EVENT MAINTENANCE FORM

SITE: LITHONIA LIGHTING CO
PROGRAM: SITE EVALUATION

EPA ID: GAD056201585 PROGRAM CODE: H01 EVENT TYPE: DS1

FMS CODE: EVENT QUALIFIER: EVENT LEAD: E

EVENT NAME: DISCOVERY STATUS:

DESCRIPTION:

* ACTION: _

* _ _ _ _ _
* _ _ _ _ _
* _ _ _ _ _
* _ _ _ _ _
* _ _ _ _ _

ORIGINAL	CURRENT	ACTUAL
START:	START:	START:
COMP :	COMP :	COMP : 80/08/01

* _/_/_ _/_/_ _/_/_
* _/_/_ _/_/_ _/_/_

HQ COMMENT:

* _ _ _ _ _
* _ _ _ _ _

RG COMMENT:

COOP AGR # AMENDMENT # STATUS STATE %

* _ _ _ _ _

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REMEDIAL RESPONSE
C E R C L A

PAGE: 480
RUN DATE: 85/10/18
RUN TIME: 08:39:07

M.2 EVENT MAINTENANCE FORM

* ACTION: _

SITE: LITHONIA LIGHTING CO
PROGRAM: SITE EVALUATION

EPA ID: GAD056201585 PROGRAM CODE: H01 EVENT TYPE: PA1

FMS CODE: EVENT QUALIFIER: EVENT LEAD: S

EVENT NAME: PRELIMINARY ASSESSMENT STATUS:

DESCRIPTION:

* _
* _____
* _____
* _____
* _____

ORIGINAL	CURRENT	ACTUAL
START:	START:	START: 85/09/17
COMP :	COMP :	COMP : 85/09/17

* _/_/_ _/_/_ _/_/_
* _/_/_ _/_/_ _/_/_

HQ COMMENT:

* _____

RG COMMENT:

* _____

COOP AGR # AMENDMENT # STATUS STATE %

* _____

REGION: 04
STATE : GA

U.S. ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF EMERGENCY AND REVEDIAL RESPONSE
C E R C L A

PAGE: 481
RUN DATE: 85/10/18
RUN TIME: 08:39:07

M.2 - COMMENT MAINTENANCE FORM

SITE: LITHONIA LIGHTING CO

EPA ID: GAD056201585

COM
NO COMMENT

001 PART A- ON FILE

ACTION

* _____ *

* _____ *

LITHONIA LIGHTING CO
GADO56201585
PRELIMINARY ASSESSMENT COVER SHEET

This facility is a Treatment/Storage/Disposal (TSD) facility that is regulated by the Georgia Environmental Protection Division under the authority of the Georgia Hazardous Waste Management Act (GHWMA). This facility presently has either Interim Status (Part A on file) or has a Hazardous Waste Facility Permit (Part B is complete). Any releases of hazardous wastes at this facility are regulated as a "prior release" under GHWMA and all corrective actions will be negotiated through the Part B Permit review process. This site is therefore assessed a "NONE" priority for a Site Inspection. No further investigations are recommended with respect to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

PMA/mcw008

NFRAP
9-7-90



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION

01 STATE 02 SITE NUMBER
GA D056201585

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Lithonia Lighting Co.		02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 1335 Industrial Blvd.				
03 CITY Conyers		04 STATE GA	05 ZIP CODE 30207	06 COUNTY Rockdale	07 COUNTY CODE 247	08 CONG DIST 04
09 COORDINATES LATITUDE _____		LONGITUDE _____				

10 DIRECTIONS TO SITE (Starting from nearest public road)

Take the Hwy. 124 exit off I-20 East take a left onto 124 until you intersect with McDaniel Road, take a right onto McDaniel and go approximately 4 miles to Industrial Blvd, take a left and follow Industrial Blvd. to Lithonia Lighting.

III. RESPONSIBLE PARTIES

01 OWNER (If known) National Service Industries, Inc.		02 STREET (Business, mailing, residential) P. O. Box A			
03 CITY Conyers		04 STATE GA	05 ZIP CODE 30207	06 TELEPHONE NUMBER (404) 922-9000	
07 OPERATOR (If known and different from owner) Lithonia Lighting Company		08 STREET (Business, mailing, residential) 1335 Industrial Blvd.			
09 CITY Conyers		10 STATE GA	11 ZIP CODE 30207	12 TELEPHONE NUMBER (404) 922-9000	

13 TYPE OF OWNERSHIP (Check one)

☒ A. PRIVATE ☐ B. FEDERAL: _____ (Agency name) ☐ C. STATE ☐ D. COUNTY ☐ E. MUNICIPAL
☐ F. OTHER: _____ (Specify) ☐ G. UNKNOWN

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☐ A. RCRA 3001 DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☐ B. UNCONTROLLED WASTE SITE (CERCLA 103 c) DATE RECEIVED: ____/____/____ MONTH DAY YEAR ☒ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 02/09/84 MONTH DAY YEAR <input type="checkbox"/> NO		BY (Check all that apply) <input type="checkbox"/> A. EPA <input type="checkbox"/> B. EPA CONTRACTOR <input checked="" type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: _____ (Specify) CONTRACTOR NAME(S): _____			
02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN		03 YEARS OF OPERATION BEGINNING YEAR _____ ENDING YEAR _____ <input checked="" type="checkbox"/> UNKNOWN			

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED

Spent solvents are generated by this manufacturing operations and are stored on site for less than 90 days. Waste solvents are sent to Ashland Chemical Company for recycling.

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

No prior or continuing releases are present that are not related to the regulated unit. Facility is regulated under Hazardous Waste Management Act.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste Information and Part 3 - Description of Hazardous Conditions and incidents)
☐ A. HIGH (inspection required promptly) ☐ B. MEDIUM (inspection required) ☐ C. LOW (inspect on time available basis) ☒ D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT David Stirewalt		02 OF (Agency/Organization) Lithonia Lighting Company		03 TELEPHONE NUMBER (404) 922-9000	
04 PERSON RESPONSIBLE FOR ASSESSMENT Alan R. Laros <i>PMA</i>		05 AGENCY DNR	06 ORGANIZATION EPD-FCU	07 TELEPHONE NUMBER (404) 656-7802	08 DATE 08/18/85 MONTH DAY YEAR

J. Lunn

[illegible]

EPA FORM 2070-12 (7-81)



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA D056201585

II. HAZARDOUS CONDITIONS AND INCIDENTS

01 ☐ A. GROUNDWATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ B. SURFACE WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ C. CONTAMINATION OF AIR

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ D. FIRE/EXPLOSIVE CONDITIONS

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ E. DIRECT CONTACT

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ F. CONTAMINATION OF SOIL

03 AREA POTENTIALLY AFFECTED: _____
(Acres)

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ G. DRINKING WATER CONTAMINATION

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ H. WORKER EXPOSURE/INJURY

03 WORKERS POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ I. POPULATION EXPOSURE/INJURY

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 3 - DESCRIPTION OF HAZARDOUS CONDITIONS AND INCIDENTS

I. IDENTIFICATION

01 STATE 02 SITE NUMBER

GA D056201585

II. HAZARDOUS CONDITIONS AND INCIDENTS (Continued)

01 ☐ J. DAMAGE TO FLORA
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ K. DAMAGE TO FAUNA
04 NARRATIVE DESCRIPTION (include name(s) of species)

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ L. CONTAMINATION OF FOOD CHAIN
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ M. UNSTABLE CONTAINMENT OF WASTES
(Spills, runoff, standing liquids, leaking drums)

03 POPULATION POTENTIALLY AFFECTED: _____

02 ☐ OBSERVED (DATE: _____)

04 NARRATIVE DESCRIPTION

☐ POTENTIAL

☐ ALLEGED

01 ☐ N. DAMAGE TO OFFSITE PROPERTY
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ O. CONTAMINATION OF SEWERS, STORM DRAINS, WWTPs
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

01 ☐ P. ILLEGAL/UNAUTHORIZED DUMPING
04 NARRATIVE DESCRIPTION

02 ☐ OBSERVED (DATE: _____)

☐ POTENTIAL

☐ ALLEGED

05 DESCRIPTION OF ANY OTHER KNOWN, POTENTIAL, OR ALLEGED HAZARDS

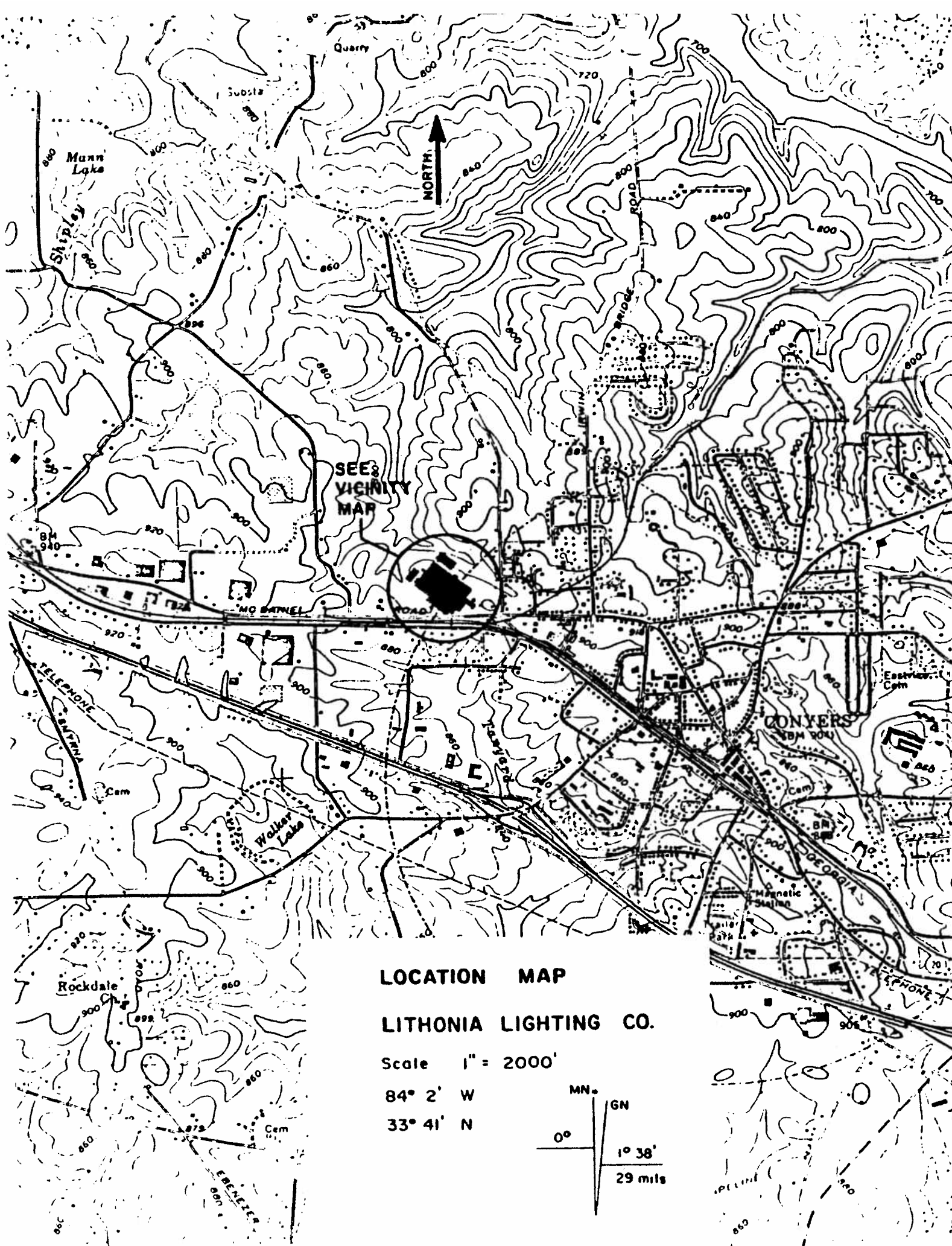
III. TOTAL POPULATION POTENTIALLY AFFECTED: _____

IV. COMMENTS

V. SOURCES OF INFORMATION (Cite specific references e.g., state files, sample analysis reports)

POOR LEGIBILITY

**PORTIONS OF THIS DOCUMENT
MAY BE UNREADABLE, DUE TO
THE QUALITY OF THE
ORIGINAL**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JUN 11 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Randy Patterson
Rutherford County Airport Authority
622 Airport Road
Rutherfordton, North Carolina 28139

SUBJ: SPCC Inspection Letter of Deficiency
Rutherford County Airport Authority
SPCC Inspection Number: NC1503-007

Dear Mr. Patterson:

On May 12, 2015, representatives of the U.S. Environmental Protection Agency Region 4 (EPA Region 4) inspected Rutherford County Airport Authority's facility located at 622 Airport Road, Rutherfordton, NC. The purpose of this inspection was to determine the facility's compliance status with the requirements of the Oil Pollution Prevention Regulations at Title 40 of the Code of Federal Regulations (40 CFR) Part 112, promulgated pursuant to Section 311(j) of the Clean Water Act (the Act), 33 U.S.C. § 1321(j).

The inspection revealed the following deficiencies:

- 1) Failure to prepare a written Spill Prevention Control and Countermeasure (SPCC) Plan for the facility as required by 40 CFR § 112.3(a) in accordance with the guidelines for plan preparation at 40 CFR § 112.7:
 - a) Plan did not discuss countermeasures for discharge discovery, response, and cleanup as required by 40 CFR § 112.7(a)(3)(iv);
 - b) Plan did not include a list with the phone numbers of individuals and agencies to contact in the event of a discharge as required by 40 CFR § 112.7(a)(3)(vi);
 - c) Plan did not discuss the method, design, nor capacity of secondary containment for piping, tanker truck loading/unloading areas, nor for mobile refuelers as required by 40 CFR § 112.7(c) (Note that secondary containment in these areas can be active and/or passive in design and should address the typical failure mode and the most likely quantity of oil that would be discharged);
 - d) Plan did not discuss any applicable more stringent state rules and regulations as required by 40 CFR § 112.7(j);
 - e) Plan did not discuss the qualifications of personnel performing tests and inspections in accordance with industry standards as required by 40 CFR § 112.8(c)(6);
 - f) Plan did not discuss liquid level sensing devices as required by 40 CFR § 112.8(c)(8);
 - g) Plan did not discuss pipe terminal connections nor vehicle warning mechanisms as required by 40 CFR § 112.8(d)(2 & 5).

- 2) Failure to implement a SPCC Plan as required by 40 CFR § 112.3(a) in accordance with the guidelines for plan implementation at 40 CFR § 112.7 and/or § 112.8:
- a) Secondary containment is not provided for all bulk storage containers as required by 40 CFR § 112.8(c)(2);
 - b) Records of dike drainage events are not maintained as required by 40 CFR § 112.8(c)(3);
 - c) Records of inspections and tests are not maintained as required by 40 CFR § 112.7(e) and § 112.8(c)(6).

Technical Recommendation:

- Bulk storage containers must be permanently closed per the definition of *permanently closed* at 40 CFR § 112.2 for such containers to be exempt from the SPCC regulation.

Please correct the deficiencies in accordance with the regulations and submit a notarized copy of the enclosed "Statement of Correction" within sixty (60) days after receipt of this letter to:

Ted Walden
Superfund Division
EPA Region 4
61 Forsyth St. SW
Atlanta, GA 30303

In the event that the Rutherford County Airport Authority is unable to submit the "Statement of Correction" within the 60 day period, please notify me in writing or email. I will advise you of an alternative acceptable date for the SPCC Plan amendments and implementation.

Please be advised that notwithstanding the issuance of this letter or the receipt of your "Statement of Correction," pursuant to Section 311 of the Act, 33 U.S.C. § 1321, EPA Region 4 retains the right to bring an enforcement action against the Rutherford County Airport Authority based on the deficiencies cited in this letter.

If you have any questions regarding this letter or the enclosure, please contact me at (404) 562-8752 or walden.ted@epa.gov.

Sincerely,



Ted Walden
Federal On-Scene Coordinator
Emergency Response and Removal Branch

Enclosures

- (1) Statement of Correction
- (2) Mobile Refueler Fact Sheet

Case Number: NC1503-007

STATEMENT OF CORRECTION

I hereby certify under penalty of perjury that all deficiencies listed in the Letter of Deficiency dated _____ have been corrected and that _____ is now in compliance with all requirements of 40 CFR Part 112.

Owner's/Operator's Name

Owner's/Operator's Signature

Date

Facility

Sworn to and before me this

_____ day of _____, 201_

NOTARY PUBLIC



Spill Prevention, Control, and Countermeasure (SPCC) Rule Amendments

Streamlined Requirements for Mobile Refuelers

In December 2006, EPA amended the SPCC rule to streamline some of the requirements for facilities with smaller oil storage capacity and specific types of equipment, including those for sized secondary containment for mobile refuelers. Owners and operators of mobile refuelers at a non-transportation-related facility will no longer need to provide sized secondary containment systems, which are systems large enough to contain the capacity of the largest single compartment or container on a mobile refueler along with enough room to contain precipitation. Providing sized secondary containment for vehicles that move frequently within a facility to perform refueling operations can raise safety and security concerns. However, the SPCC rule's general secondary containment requirements still apply to mobile refuelers as well as containment requirements associated with oil transfers.

What is a mobile refueler?

A mobile refueler is a bulk storage container onboard a vehicle or being towed that is designed or used solely to store and transport fuel for transfer into or from an aircraft, motor vehicle, locomotive, vessel, ground service equipment, or other oil storage container.

Mobile refuelers may be found at the following non-transportation-related locations: industrial sites, airports, military bases, construction sites, chemical complexes, mining sites, seaport terminals, and tank truck home bases.

How do the new changes apply to mobile refuelers?

Mobile refuelers are now exempt from the following sized secondary containment provisions that still apply to all other bulk storage containers and mobile/portable bulk storage containers:

- Sections 112.8(c)(2) and (11) for petroleum oils
- Sections 112.12(c)(2) and (11) for animal fats and vegetable oils

These provisions previously required sized secondary containment for mobile refuelers, such as a dike or catchment basin, of sufficient size to contain the capacity of the largest

compartment or container on a mobile refueler along with enough room to contain precipitation.

The exemption does not apply to refuelers used primarily for the bulk storage of oil in a fixed location in place of stationary containers (e.g., a refueler that no longer can move or conduct transfers and is left only to serve as a bulk storage container).

What secondary containment requirements continue to apply?

General secondary containment requirements in §112.7(c) still apply to mobile refuelers at SPCC regulated facilities.

General secondary containment should be designed to address the most likely discharge from the container and from oil transfers into or from the mobile refueler. The general secondary containment requirements:

- Do not prescribe a size for a secondary containment structure but require that the containment system prevent the spilled oil from escaping the system prior to clean up occurring
- Require appropriate containment and/or diversionary structures or equipment to prevent a discharge to navigable waters or adjoining shorelines